

[DATE], 2024

EXHIBIT 5

Via USPS Priority Mail

{AG name}

Attorney General of {state}

{address 1}

{address 2}

Re: **Class Action Fairness Act Notice**

Daggett, et al. v. Waters Corporation, et al.

United States District Court for the Southern District of Massachusetts

Civil Action No. 1:23-cv-11527

Dear Recipient:

ANALYTICS CONSULTING LLC, an independent claims administrator, on behalf of Defendants, Waters Corporation, Waters Technologies Corporation, the Board of Directors of Waters Technologies Corporation, and the Employee Benefits Administrative Committee of Waters Technologies Corporation (collectively, “Defendants,” and with Plaintiff, the “Settling Parties”), hereby provides your office with this notice under the provisions of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to advise you of the proposed settlement of the above-captioned class action lawsuit (the “Class Action”) currently pending in the United States District Court for the District of Massachusetts.

Plaintiff filed a Settlement Agreement (“Settlement Agreement”) and associated documents with the Court on September 30, 2024. A hearing on preliminary approval of the settlement is currently scheduled for [DATE] at [TIME] before the Honorable Judge Myong J. Joun at the United States District Court for the District of Massachusetts, John Joseph Moakley U.S. Courthouse, 1 Courthouse Way, Boston, MA 02210, in Courtroom [NO.].

In reference to this letter, a website has been set up for viewing the documents associated with this case. The website is [INSERT] and on this website, under the folder with the case name, the following documents can be found:

1. The Complaint and any materials filed with the Complaint.

The original complaint (Dkt. No.¹ 1) and the amended complaint (Dkt. No. 19) in the Class Action is available on the above referenced website. In addition, the complaint, amended complaint, and all other unsealed pleadings and records filed in the Class Action are available on the internet through the federal government’s

¹ Citations to “Dkt. No. ___” refer to docket entries in Case No. 1:23-cv-11527.

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PACER service at <https://ecf.mad.uscourts.gov/cgi-bin/ShowIndex.pl>. Additional information about the PACER service may be found at <https://www.pacer.gov>.

2. Notice of any scheduled judicial hearing in the class action.

The Court has scheduled a hearing on Plaintiff's motion to preliminarily approve the settlement on [DATE] at [TIME] before the Honorable Judge Myong J. Joun at the United States District Court for the District of Massachusetts, John Joseph Moakley U.S. Courthouse, 1 Courthouse Way, Boston, MA 02210, in Courtroom [NO.]. Information concerning any changes to the date, time, and location of the hearing will be available through PACER and can be accessed as described in section (1) above.

3. Any proposed or final notification to class members.

Plaintiff's Motion for Preliminary Approval of Settlement (Dkt. No. [REDACTED]), the Memorandum in Support of Plaintiffs' Motion for Preliminary Approval of Settlement (Dkt. No. [REDACTED]), and all supporting documents (Dkt. Nos. [REDACTED] & [REDACTED]) are available on the above referenced website. The parties' Settlement Agreement and its Exhibits 1-4 (Dkt. No. [REDACTED]) are available on the above referenced website.

The proposed forms of direct notice to class members, which provides notice of the proposed settlement, are included as Exhibits 1 & 2 of the Settlement Agreement is available on the above referenced website.

4. Any proposed or final class action settlement.

As discussed in section (3) above, the parties' Settlement Agreement and its Exhibits 1-4 (Dkt. No. [REDACTED]) are available on the above referenced website.

5. Any settlement or other agreement contemporaneously made between Class Counsel and counsel for Defendants.

There are no additional agreements between Class Counsel and counsel for Defendants.

6. A final judgment or notice of dismissal.

No final judgment or notice of dismissal has yet been entered in the Class Action. Upon entry, a copy of the Final Order and Judgment will be available through PACER and can be accessed as described in section (1) above. A proposed Final Approval Order, as filed with the Court on [DATE], 2024 as Exhibit 4 to the Settlement Agreement, is available on the above referenced website.

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7. Names of class members who reside in each state and the estimated proportionate share of the claims of such members to the entire settlement.

Given the nature of the claims in the Class Action, it is not feasible at this time to ascertain the names of all the members of the class who reside in each state or the estimated proportionate share of the claims of such members to the proceeds of the Settlement. It also is not feasible to provide an estimate of the number of members of the class residing in each state and the estimated proportionate share of the claims of such members to the Settlement. Because this is a settlement class under Federal Rule of Civil Procedure 23(b)(1), class members do not have a right to request exclusion from the class.

8. Any written judicial opinion relating to the materials described in sections (3) through (6).

No written judicial opinions have been issued relating to the proposed settlement as of this time.

The Defendants in this matter are represented by Alison V. Douglass of Goodwin Procter LLP, 100 Northern Avenue Boston, MA 02210 and Benjamin S. Reilly of Goodwin Procter LLP, 1900 N Street NW Washington, DC 20036. Should you have any questions regarding this matter, please do not hesitate to contact Alison V. Douglass at (617) 570-1000 or Benjamin S. Reilly at (202) 346-4000.

Thank you for your attention to this matter.

Sincerely,

[SETTLEMENT ADMINISTRATOR SIGNATURE BLOCK]